

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America,

Plaintiff,

v.

Omarri Montre Wade,

Case No. 25-30151

Defendant(s).

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief:

On or about the date(s) of March 15, 2025, in the county of Genesee  
in the Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 922(o)	Unlawful possession of a machinegun
18 U.S.C. § 922(g)(1)	Felon in possession of a firearm

This criminal complaint is based on these facts:

Please see the attached affidavit.

Continued on the attached sheet.

*T. Monfette*

Complainant's signature

Todd Monfette, Special Agent - ATF&E

Printed name and title

Sworn to before me and signed in my presence.

Date: March 17, 2025

*65 P. 2*

Judge's signature

City and state: Detroit, Michigan

Anthony P. Patti, United States Magistrate Judge  
Printed name and title

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Special Agent Todd Monfette, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION & AGENT BACKGROUND**

1. I make this affidavit from personal knowledge based on the following: my participation in this investigation, including witnessing interviews by myself and/or other law enforcement officers, communications with others who have personal knowledge of the events and circumstances described herein, and information gathered through my training and experience. The information outlined below is for the limited purpose of obtaining a criminal complaint and an arrest warrant. I have not set forth each and every fact I have learned in this investigation.

2. I have been a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives, United States Department of Justice, assigned to the Detroit Field Division since July 2017. I graduated from the Criminal Investigator Training Program and the ATF Special Agent Basic Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. During my employment with ATF, I have conducted and or participated in numerous criminal investigations involving the possession and use of firearms, drug trafficking violations, criminal street gangs and other violations of federal law.

**PURPOSE OF AFFIDAVIT**

3. The purpose of this affidavit is to establish probable cause that on or about March 15, 2025, in the Eastern District of Michigan, Omarri Montre Wade (DOB XX/XX/200) violated 18 U.S.C. § 922(o) (unlawful possession of a machinegun) and 18 U.S.C. § 922(g)(1) (felon in possession of a firearm).

**PROBABLE CAUSE**

4. On March 17, 2025, I reviewed documents regarding the March 15, 2025, arrest of Omarri Wade, during which police recovered a Glock 19 pistol with an installed machine gun conversion kit.

5. On March 15, 2025, Michigan State Police (MSP) Troopers responded to the area Cherrylawn Drive and Cloverlawn Drive in the city of Flint Michigan, in response to a report of a large fight with people with guns.

6. After Troopers arrived on scene, they contacted the occupants of a black Jeep. The front passenger was later identified as Omarri Wade.

7. Troopers asked and directed Wade and the other occupants to exit the vehicle, but Wade refused. Police officers removed Wade from the vehicle and placed Wade under arrest for resisting and obstructing.

8. In Wade's pants, he had a Glock, model 19, 9mm pistol with an installed pink machinegun conversion device. The pistol was loaded with an extended magazine.

9. Based on my training and experience, I know that machinegun conversion devices convert semi-automatic firearms into machineguns, and I know it is illegal to possess such devices.

10. On March 17, 2025, I reviewed a Computerized Criminal History (CCH) report for Wade, which revealed that on September 10, 2020, Wade was convicted in Genesee County Circuit Court of the following offenses, which are punishable by a term of incarceration exceeding one year:

- assault with a dangerous weapon;
- aggravated stalking;
- carrying a concealed weapon; and,
- receiving and concealing a stolen firearm.

11. On March 17, 2025, I contacted ATF Special Agent Kyle McGraw who has specialized training in the interstate nexus of firearms. I described the markings on the Glock, model 19, 9mm caliber pistol to SA McGraw. Based on the description, SA McGraw advised that the firearm was manufactured outside of the state of Michigan and therefore was possessed in and affecting interstate commerce.

### **CONCLUSION**

12. Based upon the above information, there is probable cause that on or about March 15, 2025, in the Eastern District of Michigan, Omarri Wade violated 18

U.S.C. § 922(o) (unlawful possession of a machinegun) and 18 U.S.C. § 922(g)(1) (felon in possession of a firearm).

*T. Monfette*

Special Agent Todd Monfette  
Bureau of Alcohol, Tobacco, Firearms and Explosives

Subscribed and sworn before me or  
by reliable electronic means.

*AP.2*

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Honorable Anthony P. Patti  
United States Magistrate Judge

Dated: March 17, 2025